



The Norwegian Kennel Club's response Proposal for a Regulation of the European Parliament and the Council on the WELFARE OF DOGS AND CATS and THEIR TRACEABILITY

The Norwegian Kennel Club (NKK) appreciate the opportunity to comment on the proposal for a regulation on the breeding, registration and sale of cats and dogs in the EU. Since the proposed regulation is also relevant for the European Economic Area, we wish to give our viewpoints on the proposal.

The Norwegian Kennel Club (NKK) was founded in 1898, and is the largest organisation for dog owners in Norway. The NKK has 270 breed and activity clubs as members, and through them we organize more than 100 000 individual members, and a separate youth organisation, the NKKU.

We register approximately 35 000 puppies annually, and our health department registers HD/ED and other health information.

General comments to the proposal

The NKK welcomes the proposal of a mandatory and uniform identification of cats and dogs in the common market. We have for many decades already, required identification for all dogs that are registered in the NKK, and believe it's essential to reduce problems regarding stray dogs. It also creates a higher threshold for treating animals poorly as it's easier to trace the dog back to a legally responsible individual.

We also support the intention to increase the general welfare of cats and dogs by expecting certain levels of competence and qualifications from people responsible for handling them. NKK believes that education, developing skills and qualifications is important in regards to achieve good welfare for animals.

We applaud the efforts of the EU and the Commission to increase the quality of life to cats and dogs living in the Union and the Common Market. As we agree fully with the intention of the proposal, NKK will give feedback to only a few points.

Article 4:

We believe that all breeders, regardless of size of operations should act responsibly and all animals should be treated well. This also extends to shelters and establishments in charge of ownerless animals.

We do not support the keeping and selling of cats and dogs in pet shops and believe this should be banned in all of the EU.

Article 6:

NKK believe that only clinically healthy dogs should be used in breeding. Breeding and reproduction of dogs must have long-term aims which promotes good and healthy dogs.

Article 9:

Article 9.2 states that competences shall be documentet. The NKK, through our clubs, offer a wide range of instructor training and classes for dog owners. We support the intentions of the article, and believe education and training should be required to happen through serious and publicly acknowledged actors.

Article 15:

The NKK does not approve of painful practices, and agree that any form of mutilations or esthetic procedures should be illegal.



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*Hund til
nytte og glede*

We wish to point out that the only allowed use of electric current is in regards to aversive training for hunting dogs, in order to ensure the safety of grazing sheep. This training must happen through recognised organisations and only performed by qualified personell. The training should never put the dog in prolonged pain.